

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JIM S. ADLER, P.C. and JIM ADLER,

Plaintiffs,

V.

**MCNEIL CONSULTANTS, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER,
QUINTESSA MARKETING, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER
and LAUREN VON MCNEIL,**

Defendants.

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FILE UNDER SEAL

CIVIL NO. 3:19-CV-2025-K

**APPENDIX TO DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT
ON PLAINTIFFS' CLAIMS FOR DILUTION, MISAPPROPRIATION, TORTIOUS
INTERFERENCE, AND REQUEST FOR DISGOREMENT**

1. Excerpts from Christopher Anderson deposition App. 1-22

DATE: January 13, 2023

Respectfully submitted,

/s/ Christopher J. Schwegmann

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MCNEIL CONSULTANTS, LLC D/B/A

ACCIDENT INJURY LEGAL CENTER,

QUINTESSA MARKETING, LLC D/B/A

ACCIDENT INJURY LEGAL CENTER and

LAUREN VON MCNEIL

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via ECF on counsel of record on January 13, 2023.

/s/ Rebecca L. Adams

Rebecca L. Adams

R. Christopher Anderson - CONFIDENTIAL/ ATTORNEYS' EYES ONLY - November 11, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JIM S. ADLER, P.C. and JIM)
ADLER)
Plaintiffs,)
VS.) CIVIL NO. 3:19-CV-2025-K
MCNEIL CONSULTANTS, LLC,)
D/B/A ACCIDENT INJURY LEGAL)
CENTER, QUINTESSA MARKETING)
LLC, D/B/A ACCIDENT INJURY)
LEGAL CENTER and LAUREN VON)
MCNEIL)
Defendants)

ORAL AND VIDEOTAPED DEPOSITION OF
R. CHRISTOPHER ANDERSON
NOVEMBER 11, 2022

CONFIDENTIAL/ATTORNEYS' EYES ONLY
(REMOTELY REPORTED)

ORAL AND VIDEOTAPED DEPOSITION of R.
CHRISTOPHER ANDERSON, produced as a witness at the
instance of the Defendants and duly sworn, was taken in
the above-styled and numbered cause on the 11th day of
November, 2022, from 9:39 a.m. to 4:33 p.m., before
Rebecca Jones, Certified Shorthand Reporter in and for
the State of Texas, reported by computerized stenotype
machine, at Christopher Anderson's Office, 500 W. 2nd
Street, Suite 1900, Austin, Texas 78701 pursuant to the
Texas Rules of Civil Procedure, the First Emergency
Order regarding the COVID-19 State of disaster, and the
provisions stated on the record or attached hereto.

R. Christopher Anderson - CONFIDENTIAL/ ATTORNEYS' EYES ONLY - November 11, 2022

A P P E A R A N C E S

FOR THE PLAINTIFFS:

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Also Present:

Host, Ray Aguirre

Videographer, Guy Tubbs

1 ended up going to Quintessa in this particular case.

2 So if you sort of triangulate the two
3 pieces of information, that customers thought they were
4 getting Adler but got someone else and the fact that
5 Quintessa was bidding head to head directly against
6 Adler and achieving a position on the search engine
7 results above that, that the combination of at least
8 those two datapoints showed that customers were
9 ultimately going to go to Quintessa.

10 Q. Is it your opinion or contention that any
11 Internet user who enters a search for Jim Adler but
12 ultimately retains a different attorney is a lost sale
13 for Adler?

14 A. I don't think I would put it that way, no.

15 Q. Okay. Did you review Adler's daily sign up
16 reports in support -- or to determine whether Adler lost
17 sales?

18 A. No, I did not.

19 Q. Did you ask for that information?

20 A. I don't know what that is. So, no, I didn't.

21 Q. Well, are you aware that Ms. Traveki testified
22 yesterday that Adler's firm tracks its daily sign-ups?

23 A. No, I don't know what she testified to
24 yesterday.

25 Q. Well, did you ask anyone in Adler's office

1 Q. Do you know, sitting here today, whether
2 Adler's average daily sign-ups have increased or
3 decreased between 2019 and 2022?

4 A. No. I don't know.

5 Q. Wouldn't that information be relevant to
6 determining whether Adler lost sign-ups due to
7 Quintessa's alleged infringement?

8 A. It's possible that it is but because I don't
9 know what it is and I don't know anything about what the
10 data is or how it's tracked, I can't say one way or
11 another if it is.

12 Q. Okay. So you didn't review any data from Adler
13 about his daily, monthly or annual sign-ups, correct?

14 A. I think that's correct. I don't recall seeing
15 anything like that.

16 Q. And just to make sure we're on the same page,
17 when we say "sign-ups" that's the same thing as client
18 engagement, which you said is what you are referring to
19 when you say "sales," right?

20 A. I don't follow your question exactly. Will you
21 repeat that?

22 Q. Well, earlier we said -- you said that when you
23 are saying "lost sales" in this context, that you are
24 referring to client engagements, right?

25 A. Yes. I think that's fair.

1 Q. Okay. And so, I guess, I'm just saying when we
2 say "sign-ups," that's the same thing as a client
3 engagement, fair?

4 A. I just don't know. I haven't seen that
5 document and don't know anything about what that data
6 is, so I can't speak to what it does or doesn't say.

7 Q. Okay. So you didn't review any of Adler's
8 actual data with respect to client engagements to
9 develop your opinion that Adler lost client engagements,
10 did you?

11 A. I don't recall if I saw anything about their
12 specific client engagements. It doesn't -- doesn't
13 sound familiar.

14 Q. Okay. And you didn't do any analysis to
15 determine whether Quintessa's bidding activity
16 correlated or caused any increase or decrease in Adler's
17 client engagements, did you?

18 A. No. I don't believe so.

19 Q. Okay. So you don't have any basis for opining
20 that Adler actually lost or suffered a decrease in
21 client engagements as a result of Quintessa's bidding
22 activity --

23 MR. MATTHYSSE: Objection --

24 Q (By Ms. Adams) -- did you or do you?

25 MR. MATTHYSSE: Objection to form.

1 asking -- I'm wanting a precise answer. You don't --
2 your opinion that clients -- that Adler lost client
3 engagements is not actually based on any of Adler's data
4 with respect to client engagements, is it?

5 A. I'm not sure. With respect to daily sign-ups,
6 I don't have any data about daily sign-ups or the number
7 of clients that they signed up on a daily basis. But
8 the auction insights data is -- is specific to Adler and
9 their performance with respect to the keyword searching,
10 so I'm not sure if that has some connection to what it
11 is that you are talking about.

12 Q. Okay. Setting aside the daily sign-ups, did
13 you review any data from Adler regarding client
14 engagements?

15 A. You could -- you could argue that the auction
16 insights data is Adler data or specific to Adler that
17 has some bearing on client engagements.

18 Q. Okay. Well, did you do any analysis -- did you
19 do any analysis to determine how many -- that would
20 allow you to tie Adler's bidding data to actual client
21 engagements or sign-ups?

22 A. Not anything with respect to Adler's bidding
23 data, no.

24 Q. Okay. So you cannot tie or tell me how Adler's
25 bidding data is related to client engagements, right?

1 A. When you say "bidding data," I'm not clear on
2 what it is you mean by that.

3 Q. Well, his auction insights -- his Google Ad
4 data, is that better?

5 A. Yes. So will you repeat the question with that
6 understanding?

7 Q. All right. So you do -- you cannot tell me how
8 Adler's Google Ad data correlates to his client
9 engagements, right?

10 A. Right. I don't have a statistic that shows
11 that.

12 Q. Okay. So you -- so given that you cannot tie
13 Adler's Google Ad data to his client engagements, you
14 also did not review any data related to client
15 engagements, right?

16 MR. MATTHYSSE: Objection to form.

17 A. It's sort of a broad thing to say because I do
18 think that the auction insights data does contain some
19 information about client engagements for Adler, so I
20 think it's too broad to say "I didn't review any data."
21 But with respect to some specific date that you have
22 asked about, I don't have that specific data that you're
23 referring to.

24 Q. Well, I'm a little bit confused. I thought we
25 just established that you could not tell me how his

1 Q. Okay. How are you connecting the dots? What
2 analysis did you do to connect those dots?

3 A. So I analyzed the auction insights data, which
4 shows a number of different metrics surrounding how
5 Adler is performing relative to others, and based on
6 that particular data, you can see that in many cases
7 Adler is not the top position in the search engine
8 results and overlaps with the number of people that are
9 competing effectively against him in that particular
10 case. And as the performance of Quintessa increased
11 over a period of time, there is -- there is, based on
12 how the search engine results work, such that the top of
13 the page is the most valuable top of the page, you can
14 conclude or at least draw a logical conclusion that
15 Adler would get fewer of those -- fewer of those calls
16 then they would have otherwise.

17 Q. Okay. Well, did you do any analysis -- did you
18 review any data with respect to Adler's call volume?

19 A. No, I didn't have that.

20 Q. Okay. So did you do any analysis with respect
21 to how Quintessa's bidding activity impacted Adler's
22 conversion rates?

23 A. I don't think so. But I don't remember
24 specifically but I don't think so.

25 Q. Did you do any analysis as to how Quintessa's

1 Q. Okay. You don't know, sitting here today,
2 whether Adler's average daily sign-ups would increase or
3 decrease for your damages period, right?

4 A. Right.

5 Q. Okay. So given that, you don't know whether
6 Adler actually lost any client engagements as a result
7 of Quintessa's bidding activity?

8 MR. MATTHYSSE: Objection to form.

9 A. I don't know of the specific client engagements
10 that they lost but I know that they lost client
11 engagements based on the bidding activity.

12 Q (By Ms. Adams) Okay. And so you are -- you are
13 drawing a conclusion from bidding activity that applies
14 to Adler's client engagements, right?

15 A. Yes. I think you could characterize it that
16 way.

17 Q. Okay. And you are drawing that conclusion
18 without having analyzed Adler's conversion rates?

19 A. Yes, I am. I don't have Adler's conversion
20 rates.

21 Q. And you are drawing that conclusion without
22 having analyzed others call volume?

23 A. Correct. I don't have their call volume.

24 Q. And you are drawing that conclusion without
25 having Adler's daily sign-up data?

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1 A. Correct. I didn't have his daily sign-up data.

2 Q. Okay. You also mentioned in that sentence in
3 Paragraph 62, the third sentence down, that you analyzed
4 available information to determine whether Adler lost
5 sales or profits, correct?

6 A. Correct.

7 Q. Okay. Did you determine that Adler lost
8 profits during the damages -- damages period?

9 A. Yes.

10 Q. Okay. And what information did you analyze to
11 determine whether Adler lost profits?

12 A. The number one thing was their cost per click.
13 If their cost went up, they would have made less profit
14 than if their costs were lower. So on the lost profits
15 scale, it's an increase in cost that caused them to lose
16 profits.

17 Q. Okay. Well, did you review Adler's -- any
18 financial statements from Adler?

19 A. I don't recall any financial statements, no.

20 Q. Okay. Did you review any ledgers?

21 A. Definitely not ledgers.

22 Q. Did you review any profit and loss statements?

23 A. No, I did not.

24 Q. Did you review any information with respect to
25 Adler's revenues during the damages period?

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1 A. No, I did not.

2 Q. Okay. Do you agree that if Adler's cost
3 increased but his revenues also increased that he may
4 not have suffered any lost profits?

5 A. That is possible.

6 Q. Did you conduct any analysis to determine
7 whether an increase in the cost per click also
8 correlated with increased conversion rates for those
9 same keywords?

10 A. Whose cost per click and whose conversion rate
11 are you referring to?

12 Q. Adler's.

13 A. Will you ask that again, please?

14 Q. Did you do any analysis to determine whether
15 Adler's increase in cost per click correlated to an
16 increase in conversion rates for Adler for those same
17 keywords?

18 A. No, I did not.

19 Q. Would you agree that if Adler's cost per click
20 went up but he's also -- as a result of that increase in
21 cost per click, he's also getting a higher conversion
22 rate, that he may not have lost profits?

23 A. I don't know one way or another.

24 Q. So that's not something you looked at?

25 A. No.

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1 A. That sounds right. I was just getting to it to
2 make sure. Yes. Okay.

3 Q. Okay. And I -- I don't see Adler 645 listed in
4 this scheduled documents you considered in the report,
5 do you?

6 A. No, I don't.

7 Q. Okay. As a matter of fact, I see -- in the
8 Bates numbers I see that you list the documents
9 labeled -- excuse me -- Adler 640 to 643 and then it
10 goes to Adler 649 to 649, is there any reason that you
11 did not review this document in coming up with your
12 report?

13 A. Not that I know of. I just don't recall ever
14 seeing it.

15 Q. Okay. Were you provided with a complete copy
16 of Adler's production in this case?

17 A. I don't know.

18 Q. Okay. So do you know if this document was ever
19 provided to you prior to your report?

20 A. I don't know.

21 Q. Okay. Would you agree that in order to
22 determine a company's profits, you need to know both
23 their revenues and their costs?

24 A. Yes.

25 Q. Okay. But you didn't -- and you looked at

1 Adler's cost per click, right?

2 A. Yes, I did.

3 Q. Okay. But you did not look at his revenues,
4 fair?

5 A. Fair.

6 Q. So you reached an opinion that Adler lost
7 profits without reviewing any data with respect to
8 revenue?

9 A. That's correct.

10 Q. Okay. So you only looked at one piece of the
11 puzzle with respect to profits, right?

12 MR. MATTHYSSE: Objection to form.

13 A. I only looked at cost but you can still draw
14 the conclusion that they lost profits if their cost
15 increased.

16 Q (By Ms. Adams) Okay.

17 A. Their profits as a percentage might not have
18 changed but their absolute profits would have changed.

19 [REDACTED]

[REDACTED]

[REDACTED]

22 A. So in this particular case, I don't know if
23 this is referring to revenue or if it's referring to
24 profit. [REDACTED]

[REDACTED]

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1 A. Right.

2 Q. And when we went on the break, Mr. Matthyse
3 got confirmation from somebody in Mr. Adler's office
4 that this summary of annual income is revenues, correct?

5 A. That's correct.

6 Q. Okay. And so just to recap, this is not a
7 document that you ever recall seeing before today,
8 right?

9 A. Right.

10 Q. And there is no indication from your report
11 that you ever reviewed this document in coming up with
12 your opinion?

13 A. That's correct.

14 Q. And you don't recall reviewing any other
15 financial documentation related to revenues in coming up
16 with your opinions, correct?

17 A. Whose revenues are you referring to?

18 Q. Adler's?

19 A. Correct.

20 Q. Okay. All right. [REDACTED]

[REDACTED]

[REDACTED]

23 A. That's correct.

24 Q. Okay. And did that correlate -- did you do --
25 in your analysis, did you find that Adler's CPCs, his

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1 cost per click, also went up from 2018 to 2019?

2 A. I don't recall whether it went up from 2018 to
3 2019. [REDACTED]

4 [REDACTED]
5 [REDACTED]

6 Q. Okay. So you don't have any basis to opine
7 whether this [REDACTED] correlates with an
8 increase or decrease in profits, correct?

9 A. That's correct. I haven't seen this document
10 so I can't speak to what it says.

11 Q. And that's not something that you looked into
12 with respect to your analysis in this case, right?

13 A. Right.

14 [REDACTED]
15 [REDACTED]

16 A. Right.

17 Q. All right. And if we look at your report, if
18 you will go with me to Schedule 5.3.

19 A. Okay.

20 [REDACTED]
21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 Q. Okay. And if you will look with me at
25 Scheduled 9.

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1 A. Okay.

2 Q. Did Adler's cost per click also go down from
3 2019 to 2020?

4 A. I don't know if it went down on the whole
5 because this only does it by quarter, so I don't know
6 whether or not it went down on an annual basis from one
7 year to the next.

8 Q. Okay. That's not something that you -- that
9 you completed in your analysis?

10 A. What is not something that I completed in my
11 analysis?

12 Q. Determining whether Adler's cost per click went
13 down from 20- -- on an annual basis from 2019 to 2020 on
14 his branded campaigns?

15 A. I did not calculate it on an annual basis that
16 I recall. I believe our analysis is on a quarterly
17 basis.

18 Q. All right. So based on what we just looked at,
19 we see that combining these two documents, [REDACTED]

[REDACTED]

[REDACTED]

22 A. I think from the questions that you just asked,
23 that is true.

24 Q. Okay. And so [REDACTED]

[REDACTED]

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1 [REDACTED] and you have not done
2 any analysis to determine whether Adler's profits
3 increased or decreased from 2019 to 2020, did you?

4 A. I did not look at whether or not his total
5 profits increased or decreased from 2019 to 2020, that
6 is -- that is true.

7 [REDACTED]
8 [REDACTED]
9 A. Yes.

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 A. I'm sorry, will you repeat the question? I
14 missed a piece of it.

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 A. Not on an annual basis, no.

20 Q. Okay. Wouldn't that be important information
21 to consider, Adler's revenues, to determine whether
22 Adler actually lost profits over the damages period?

23 A. It is one variable that you can look at but you
24 can also look at cost to determine whether or not their
25 profits went up or down?

1 fewer new clients than they would have absent what she
2 was doing.

3 Q. Where in your report is the part about the
4 fewer clients?

5 A. That would be a combination of the auction
6 insights data, the data about the customers, I believe,
7 that they were calling or trying to sign up with Adler
8 who ultimately went to a Quintessa client and I think
9 there were a few other things in there but I don't know
10 that there is a -- a single crystalized piece in there
11 for you.

12 Q. Uh-huh. You didn't do any analysis to
13 determine whether changes in or increases in Adler's
14 cost per click also correlated to increased conversions,
15 right?

16 A. Right.

17 Q. And you did not do any analysis to determine
18 whether any increase in cost per click also correlated
19 with an increase in call volumes, correct?

20 A. Correct. You are referring --

21 Q. And you didn't do any --

22 A. Sorry. You are referring to Adler's cost per
23 click, right?

24 Q. Yes. We are just talking about Adler, yes.

25 A. Yes.

1 Q. And you did not do any analysis to determine
2 whether Adler's -- any increases in Adler's cost per
3 click also correlated with increases in case sign-ups or
4 client engagements, correct?

5 A. Correct.

6 Q. And just briefly to go back a step before we
7 move on from this section, when we were talking earlier
8 about lost sales or lost client engagements that you
9 opined on, you did not do any analysis to quantify the
10 number of lost client engagements that you believed
11 Adler suffered as a result of Quintessa's bidding
12 activity, right?

13 A. Right.

14 Q. So there is no number that you can point to
15 sitting here today to say Adler lost out on "X" many
16 client engagements as a result of Quintessa, fair?

17 A. Fair.

18 Q. Okay. All right. Going back to Page 20 of
19 your report, Paragraph 62.

20 A. Okay.

21 Q. Okay. And that sentence that we have been
22 looking at where you said, (reading) To do so, I
23 analyzed the available information to determine whether
24 Adler's -- or whether Adler lost sales or profits or
25 otherwise suffered some form of business loss.

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1 Right?

2 A. Right.

3 Q. Okay. So with respect to other forms of
4 business loss, you did not conduct any analysis as to
5 whether Adler suffered any alleged reputational harm,
6 did you?

7 A. No, I did not.

8 Q. Okay. So you are not offering any opinion in
9 this case that Adler suffered reputational harm, are
10 you?

11 A. I am not.

12 Q. Okay. And you did no analysis to determine
13 whether Adler suffered any loss of goodwill due to
14 Quintessa's conduct, right?

15 A. Right.

16 Q. So you are not offering any opinion on that?

17 A. That's correct. I'm not offering an opinion on
18 that.

19 Q. And you are not offering any opinion with
20 respect to any loss of enterprise value with respect to
21 the Adler firm, are you?

22 A. No, I'm not.

23 Q. You didn't analyze whether Quintessa conducts
24 caused Adler to lose market share, did you?

25 A. No, I did not.

R. Christopher Anderson - CONFIDENTIAL/ ATTORNEYS' EYES ONLY - November 11, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JIM S. ADLER, P.C. and JIM)
ADLER)

Plaintiffs,)

VS.) CIVIL NO. 3:19-CV-2025-K

MCNEIL CONSULTANTS, LLC,)
D/B/A ACCIDENT INJURY LEGAL)
CENTER, QUINTESSA MARKETING)
LLC, D/B/A ACCIDENT INJURY)
LEGAL CENTER and LAUREN VON)
MCNEIL)

Defendants)

REPORTER'S CERTIFICATION
ORAL DEPOSITION OF R. CHRISTOPHER ANDERSON
NOVEMBER 11, 2022

I, Rebecca Jones, Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, R. CHRISTOPHER ANDERSON, was
duly sworn by the officer and that the transcript of the
oral deposition is a true record of the testimony given
by the witness;

I further certify that pursuant to FRCP Rule
30(e)(1) that the signature of the deponent:

_____ was requested by the deponent or a party
before the completion of the deposition and is to
be returned within 30 days from the date of receipt of
the transcript. If returned, the attached Changes
and Signature Page contains any changes and the
reasons therefor;

_____ was not requested by the deponent or a party
before the completion of the deposition.

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That the amount of time used by each party at the deposition is as follows:

Rebecca Adams (05 hours:11 minutes)

That pursuant to information given to the deposition officer at the time said testimony was taken, the following includes counsel for all parties of record:

FOR THE PLAINTIFFS:

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I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of this action.

Certified to by me this 30th day of November, 2022.



Rebecca Jones, CSR
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